

THE HOWLEY LAW FIRM P.C.

350 FIFTH AVENUE, 59<sup>TH</sup> FLOOR  
NEW YORK, NEW YORK 10118  
(212) 601-2728  
FAX: (347) 603-1328

[www.HOWLEYLAWFIRM.COM](http://www.HOWLEYLAWFIRM.COM)

October 17, 2019

The Honorable Nina Gershon  
United States District Judge  
Eastern District of New York  
225 Cadman Plaza East  
Brooklyn, New York 11201

Re: *Paguirigan v. Prompt Nursing Employment Agency LLC, et al.*,  
1:17 Civ. 1302 (NG) (JO)

Dear Judge Gershon:

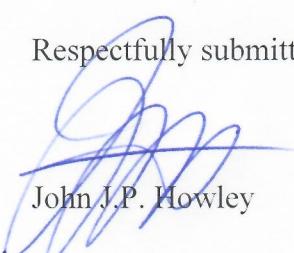
I represent the named plaintiff and the plaintiff class in the above captioned action. I write in compliance with the Court's October 2, 2019 Order directing that we file a report regarding whether any class members have opted out of the class.

We have not received any requests to opt out of the class.

We have received a number of requests to be included in the class from individuals who were not identified as class members during discovery. In response to each request, we have asked for pay stubs, W-2s, or other evidence of the person's employer and dates of employment.

To date, everyone who has requested to be included in the class has given us documents showing that their employment with defendants ended before the December 23, 2008 start date of the class period.

Respectfully submitted,

  
John J.P. Howley